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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Administrative Motion to Consider Whether Another
5 Party’s Materials Should Be Filed Under Seal.

6 2. Attached as **Exhibit A** is Uber’s Opposition to Plaintiff’s Omnibus Motion in Limine, with
7 redactions related to Plaintiff’s confidential materials.

8 3. Attached as **Exhibit B** is Ex. 2 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
9 Limine (sealed in full).

10 4. Attached as **Exhibit C** is Ex. 3 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
11 Limine (sealed in full).

12 5. Attached as **Exhibit D** is Ex. 4 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
13 Limine (sealed in full).

14 6. Attached as **Exhibit E** is Ex. 5 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
15 Limine (sealed in full).

16 7. Attached as **Exhibit F** is Ex. 6 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
17 Limine (sealed in full).

18 8. Attached as **Exhibit G** is Ex. 7 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
19 Limine (sealed in full).

20 9. Attached as **Exhibit H** is Ex. 8 to Uber’s Opposition to Plaintiff’s Omnibus Motion in
21 Limine (sealed in full).

22 I declare under penalty of perjury under the laws of the United States of America that the foregoing
23 is true and correct.

24 Dated: December 30, 2025

25 /s/ Laura Vartain Horn
26 Laura Vartain Horn